

DOCKET NO: LLI-CV-19-5011465-S	:	SUPERIOR COURT
	:	
FISHER HOUSE FOUNDATION, INC., ET AL	:	J.D. OF LITCHFIELD
	:	
VS.	:	AT TORRINGTON
	:	
KEVIN E. CREED, ET AL	:	MAY 9, 2019
	:	

**MOTION FOR CONTEMPT**  
**FOR FAILURE TO COMPLY WITH STIPULATION**

Despite the clear terms of the Stipulation (Docket No. 129), the Creed Law Firm, LLC paid funds to Mr. Creed. The very purpose of the Stipulation was to preserve the status quo, and to safeguard the assets of the Creed Law Firm, LLC, so that those assets would not be dissipated as well. That is why there was a clear prohibition against payments to Attorney Creed. The payment of the funds to Attorney Creed violates the Stipulation and the order of the Court. Attorney Creed, as the sole member of the Creed Law Firm, LLC, made those payments to himself knowingly, willfully and in utter disregard of the Court's order.

Accordingly, the Plaintiffs respectfully request that the Court:

1. find the Defendants to be in civil contempt;
2. order Attorney Creed to immediately repay all funds transferred or paid to him by the Creed Law Firm since the date of the Stipulation – March 11, 2019, to the Creed Law Firm, or preferably into the Court or to a fund beyond Attorney Creed's reach;
3. order the Defendants to pay to the Plaintiffs a fine of \$500 per day for every day from the date of the finding of contempt until such date that the funds are repaid;
4. order the Defendants to reimburse the Plaintiffs all sums incurred to induce compliance, including all attorney's fees and costs related to this motion and its prosecution<sup>1</sup>;

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<sup>1</sup> If the Court grants this request, the Plaintiffs will promptly file an Affidavit of Attorneys Fees.

5. order Mr. Creed's confinement if he does not comply within 5 business days from the date that the Court finds he is in civil contempt; and

6. appoint a temporary receiver for the Creed Law Firm pursuant to the application of the Plaintiffs dated February 13, 2019.

In support of this Motion, the Plaintiffs attach a Memorandum of Law.

The Plaintiffs,  
FISHER HOUSE FOUNDATION, INC.,  
and FRIENDS OF FISHER HOUSE  
CONNECTICUT, INC.

By: /s/ Monte E. Frank  
Monte E. Frank  
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Their Attorneys

### **CERTIFICATION**

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on the date of filing to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served, as follows

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/s/ Monte E. Frank  
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